

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA ) Case No.: 04-10231-MLW  
                              )  
                              )  
v.                          )  
                              )  
MICHAEL R. O'NEILL      )  
                              )  
                              )

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MOTION TO CONTINUE DATE OF RULE 11 PLEA

Now comes the defendant, Michael R. O'Neill, by and through his attorney, Joseph S. Oteri, and requests a further continuance in this matter and states as his reasons therefore the following:

1. In a prior motion asking for a continuance, counsel stated that he would be available during the period which the court has selected but unfortunately counsel has further problems which compel him to ask for this continuance. They are as follows:
  2. On Wednesday, June 14, 2006, counsel's uncle passed away. Counsel was extremely close to the deceased; e.g. they spoke on the phone almost every day. They visited counsel's mother in a nursing home and had lunch with her almost every Saturday for the past twelve years;
  3. Counsel, in his previous motion, mentions that he will be out of state from June 16, 2006, through June 20, 2006. Since counsel's uncle's death, counsel has been forced to change the date of his Florida trip from June 16, 2006, to the evening of June 19, 2006, which is now the date of counsel's uncle's

funeral. The appointment which counsel had on June 19, 2006, has been rescheduled for June 23, 2006.

Respectfully submitted,  
By his attorney:

*/s/Joseph S. Oteri*  
Joseph S. Oteri  
Oteri & Lawson, P.C.  
20 Park Plaza, Suite 905  
Boston, MA 02116  
617-227-3700

Date: June 16, 2006

CERTIFICATE OF SERVICE

I, Joseph S. Oteri, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 16, 2006.

*/s/Joseph S. Oteri*  
Joseph S. Oteri